

PRIVACY POLICY - Clinix

PBD Solutions Private Limited, (“us”, “we”, or “Clinix”, which also includes its affiliates) a company incorporated under the laws of India having its registered office at H. No. 11-13-49/2, Alkapuri Colony, Hyderabad, Telangana, India, 500036. (hereinafter the “the Company”, (“us”, “we” or “our”) values your privacy and is committed to ensuring that your privacy is protected and that you are aware of how your information is being used. The purpose of this privacy policy (“Privacy Policy”) is to describe how the Company collects, uses, maintains, and shares information about you (“User” or “you”).

This Privacy Policy applies to the collection, receipt, storage, usage, processing, disclosure, transfer and protection (“**Utilization**”) of your Personal Information (defined below) when You use the Clinix website available at URL: www.Clinix.co.in operated by us (“**Website**”) or mobile application of brand name “**Clinix**” available for download at Google Play Store and Apple App Store (“**Application**”) operated by PBD Solutions Private Limited or avail any Services offered by PBD Solutions Private Limited through the Website or Application.

By using this Application, you agree to the terms of this Privacy Policy. Please read the following Privacy Policy to understand how your personal information will be treated as you use this Site and its services. The following discloses our information gathering and dissemination practices.

DEFINITION

- i. “Application” shall mean and refer to “Clinix”
- ii. “Personal Information” shall mean and refer to any personally identifiable information that We may collect from You.
- iii. “Third Parties” refer to any application, website, company or individual apart from the User and the creator of the Application.

WHY THIS PRIVACY POLICY?

This Privacy Policy is published in compliance with, inter alia:

- i. Section 43A of the Information Technology Act, 2000;
- ii. Regulation 4 of the Information Technology (Reasonable Security Practices and Procedures and Sensitive Personal Information) Rules, 2011 (the “SPI Rules”);

- iii. Regulation 3(1) of the Information Technology (Intermediaries Guidelines) Rules, 2011.

THIS PRIVACY POLICY STATES THE FOLLOWING:

- i. The type of information that is collected from the Users, which includes Personal and Sensitive Personal Data or Information relating to an individual;
- ii. The purpose, means and modes of collection, usage, processing, retention, and destruction of such information; and
- iii. How and to whom we will disclose such information.

COLLECTION OF PERSONAL INFORMATION

Generally, some of the Services require us to know who you are so that we can best meet your needs. When you access the Services, or through any interaction with us via emails, telephone calls or other correspondence, we may ask you to voluntarily provide us with certain information that personally identifies you or could be used to personally identify you. You hereby consent to the collection of such information by Clinix. Without prejudice to the generality of the above, information collected by us from you may include (but is not limited to) the following:

- i. personal data of the User such as, but not limited to, Your name, Your age, date of birth, occupation, gender, and pin code
- ii. contact data (such as your email address and phone number);
- iii. data regarding your usage of the services and history of the appointments made by or with you through the use of Services
- iv. other information that you voluntarily choose to provide to us (such as information shared by you with us through emails or letters.
- v. as a User of Clinix, you may provide information about yourself, your spouse or family, your friends, their health issues, gender of the patient, age of the patient, previous medication taken, previous medical conditions, allergies, etc

The information collected from you by Clinix may constitute ‘personal information’ or ‘sensitive personal data or information’ under the SPI Rules.

“Personal Information” is defined under the SPI Rules to mean any information that relates to a natural person, which, either directly or indirectly, in combination with other information available or likely to be available to a body corporate, is capable of identifying such person. Collection of information which has been designated as ‘sensitive personal data or information’ under the Information Technology (Reasonable security practices and procedures and sensitive personal data or information) Rules requires your express consent. By affirming your assent to this Privacy Policy, you provide your consent to such collection as required under applicable law. Our Services may be unavailable to you in the event such consent through an email is not given.

For Practitioners using Clinix, we would collect your Name, Education, Specialization, address of practicing hospitals/clinics, Contact information, achievements, Device ID (IMEI), Location, etc. If you use Clinix by accessing it through your Google+ and Facebook Profiles and other API’s, we collect such data as well.

The SPI Rules further define “Sensitive Personal Data or Information” of a person to mean personal information about that person relating to:

- i.** passwords;
- ii.** financial information such as bank accounts, credit and debit card details or other payment instrument details;
- iii.** physical, physiological, and mental health condition;
- iv.** sexual orientation;
- v.** medical records and history;
- vi.** biometric information;
- vii.** information received by body corporate under lawful contract or otherwise;
- viii.** visitor details as provided at the time of registration or thereafter; and
- ix.** call data records.

Clinix will be free to use, obtain and disclose information that is freely available in the public domain without your consent.

HOW DO WE COLLECT PERSONAL INFORMATION

The methods by which We collect Your Personal Information include but are not limited to the following

- i.** Any information that you voluntarily choose to provide to us through app, website, email, during interaction with us on call or chat and other modes of communication;
- ii.** When You use the features on Our Website or Application,
- iii.** Through Your device, once You have granted permissions to Our Application (discussed below),
- iv.** Through HSP (Health Care Service Provider) pursuant to consultation on the Website or the Application,
- v.** We collect information that Your browser/app sends whenever You visit Our Website or Application, such as, the Log Data. This information is kept completely secure.

USE OF PERSONAL INFORMATION

Your Personal Information may be used for various purposes including but not limited to the following

- i.** To provide effective Services;
- ii.** To rectify customer support related issues;
- iii.** To operate and improve the Website or Application;
- iv.** To Perform Academic/Studies, Clinical or Other Research and Analysis for our Understanding, Information, Analysis, Services and Technologies in order to Provide all users Improved Quality of Care; and Ensuring that the Content and Advertising Displayed are Customized to your Interests and Preferences;
- v.** To contact You via phone, SMS, email or third-party communication services such as Whatsapp, etc. for appointments, technical issues, payment reminders, obtaining feedback and other security announcements;
- vi.** To send promotional and marketing emails from Us or any of Our channel partners via SMS, email, snail mail or third-party communication services such as WhatsApp, Facebook etc.;
- vii.** To advertise products and Services of Clinix and third parties;
- viii.** To transfer information about You if We are acquired by or merged with another company;

- ix. To share with Our business partners for provision of specific services You have ordered to enable them to provide effective Services to You;
- x. To administer or otherwise carry out Our obligations in relation to any Agreement You have with Us;
- xi. To respond to subpoenas, court orders, or legal process, or to establish or exercise Our legal rights or defend against legal claims;
- xii. To investigate, prevent, or take action regarding illegal activities, suspected fraud, violations of Our Terms of Use, breach of Our agreement with You or as otherwise required by law;
- xiii. To aggregate personal information for research for academic/studies, clinical or other research, statistical analysis and business intelligence purposes, and to sell or otherwise transfer such research, statistical or intelligence data in an aggregated and/or non-personally identifiable form to third parties and affiliates with a purpose of providing services to the users or for the advancement of scientific knowledge about health and disease.
- xiv. To make information made by Patients is displayed to Practitioners and vice versa. The information collected from Practitioners is displayed on the Application to enable a User to connect with a Practitioner of their choice.

DISCLOSURE AND TRANSFER OF YOUR DATA

We may disclose and, in some cases, transfer your personal information to such entities as required to provide services to you and to provide value added services or other third-party products and services, to the extent permitted by applicable law. These entities may be located outside India, which you hereby consent to. We require such entities to protect your information through equivalent security measures as what we would adopt. An indicative list of entities we may disclose or transfer information to, are provided below:

SERVICE PROVIDERS: We share personal information with companies that provide Services on our behalf, such as website hosting, data storage, software services, email services, marketing, fulfilling customer orders, providing payment services, data analytics, data mining, providing customer services, and conducting surveys. These companies may be located within or outside India, but in any case, are obligated to protect your data.

We may also share information with employees, data processors, consultants, business partners and technology partners on a need-to-know basis. Such entities would be contractually

obligated to maintain confidentiality in relation to your data. If you are an end user, your personal information will also be shared with your chosen HSPs.

LAW ENFORCEMENT AGENCIES: We may share information with law enforcement agencies pursuant to lawful requests for information, and otherwise as required under any law applicable at the given time, both in India and outside India.

OTHER THIRD PARTIES: We may also disclose personal information if we determine in good faith that disclosure is reasonably necessary to protect our rights and pursue available remedies, enforce our terms and conditions, investigate fraud, or protect our operations or users.

USE OF COOKIES:

- i. Cookies are files with small amount of data, which may include an anonymous unique identifier. Cookies are sent to You on the Website and/or Application.
- ii. We may store temporary or permanent ‘cookies’ on Your computer/device to store certain data (that is not Sensitive Personal Data or Information). You can erase or choose to block these cookies from Your computer. You can configure Your computer’s browser to alert You when We attempt to send You a cookie with an option to accept or refuse the cookie. If You have turned cookies off, you may be prevented from using certain features of the Website or Application.
- iii. We do not control the use of Cookies by third parties.

THIRD PARTY WEBSITES AND SERVICES

Our Website and App may contain links to third party services and give you the ability to access such third-party websites, products, and services. Please note that you may proceed to the use of such third-party website or service at your own risk and the Company will not be held liable for any outcome or harm arising as a result of your use of such third-party websites or services. Please read the privacy policies of any third party before proceeding to use their websites, products, or services. We do not bear any liability arising out of Your use of Third-party Websites.

CHANGE TO PRIVACY POLICY

Clinix may update this Privacy Policy at any time, with or without advance notice.

- i.** We reserve the right to update (change, modify, add and/or delete) this Privacy Policy from time to time at our sole discretion. There is a tab at the end of the Privacy Policy which indicates when the Privacy Policy was last updated.
- ii.** If you object to any of the changes to our terms, and you no longer wish to use the Services, you may contact support@Clinix.co.in to deactivate your account. Unless stated otherwise, Clinix current Privacy Policy applies to all information that Clinix has about you and your account. Your continued use of our products and services after the effective date of the Privacy Policy means that you accept the revised Privacy Policy.
- iii.** If a User uses the Services or accesses the Website after a notice of changes has been sent to such User or published on the Website, such User hereby provides his/her/its consent to the changed terms.

CONSENT TO THIS POLICY

- i.** You acknowledge that this Privacy Policy is a part of the Terms of Use of the Website and the other Services, and you unconditionally agree that becoming a User of the Website and its Services signifies your (i) assent to this Privacy Policy, and (ii) consent to Clinix collecting, processing and/or disclosing your Personal Information in accordance with the provisions of this Privacy Policy. Your visit to the Website and use of the Services is subject to this Privacy Policy and the Terms of Use.
- ii.** By way of this you acknowledge that your personal information is provided by You out of free will. You have an option to not provide us with any information i.e., Personal Information that is sought to be collected. You also have an option to withdraw your consent at any point followed up by an intimation in writing.
- iii.** The Website/ Application is not for the purpose/ not intended towards children. Further no personal information of children has been collected from them with prior knowledge. Do reach out to us via email if you have been made aware of personal information been collected on our website unintentionally. We assure you that the same shall be taken down with immediate effect.

GRIEVANCE OFFICER

To address any questions or complaints You may have about the processing of Your Personal Information, we have assigned a grievance officer, whose contact information is listed below. If You have any such complaints, please contact Our grievance officer at care@Clinix.co.in, and Our officer will make every effort to settle them as soon as possible.

MISCELLANEOUS

- i. **Indemnity**: You agree and undertake to indemnify us in any suit or dispute by any third party arising out of disclosure of information by you to third parties either through our Site or App or otherwise and your use and access of websites, applications and resources of third parties. We assume no liability for any actions of third parties with regard to your personal information or SPDI which you may have disclosed to such third parties.
- ii. **Severability**: Each clause of this Privacy Policy shall be and remain separate from and independent of and severable from all and any other clauses herein except where otherwise expressly indicated or indicated by the context of the Privacy Policy. The decision or declaration that one or more clauses are null and void shall have no effect on remaining clauses of this Privacy Policy.

WEBSITE TERMS

By Downloading our app or using this application, you voluntarily agree to be bound by the Terms of Use/ Service, Privacy Policy and other such policies as set forth on the website. It is further stated that all the Website's Terms and Policies are coterminous with these terms.